

Exhibit A



Notice of Service of Process

null / ALL
Transmittal Number: 25621408
Date Processed: 09/26/2022

Primary Contact: Connell Watters
Sentinel Real Estate Corporation
1251 Avenue Of The Americas
36th Floor
New York, NY 10020-1104

Electronic copy provided to: Noah Gold
Andrea Klein

Entity: Sentinel Real Estate Corporation
Entity ID Number 3070242

Entity Served: Sentinel Real Estate Corporation

Title of Action: Angela Gonyon vs. Vinyard Residential LLC, f/k/a Vineyards Apartivients, Inc.

Matter Name/ID: Angela Gonyon vs. Vinyard Residential LLC, f/k/a Vineyards Apartivients, Inc.
(12992955)

Document(s) Type: Summons/Complaint

Nature of Action: Personal Injury

Court/Agency: Shelby County Circuit Court, TN

Case/Reference No: CT-2700-22

Jurisdiction Served: Tennessee

Date Served on CSC: 09/23/2022

Answer or Appearance Due: 30 Days

Originally Served On: CSC

How Served: Certified Mail

Sender Information: Gentry Arnold, PLLC
901-591-8800

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC

251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | sop@cscglobal.com

(CIRCUIT/CHANCERY) COURT OF TENNESSEE
 140 ADAMS AVENUE, MEMPHIS, TENNESSEE 38103
 FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS

ELECTRONICALLY FILED
 2022 Jul 05 3:29 PM
 CLERK OF COURT - CIRCUIT

SUMMONS IN CIVIL ACTION

Docket No. CT-2700-22

☒ Lawsuit
☐ Divorce

Ad Damnum \$ 500,000

Angela Gonyon

VS

Vineyard Residential LLC, f/k/a Vineyard
 Apartments, Inc., and
 Sentinel Real Estate Corporation

Plaintiff(s)

Defendant(s)

TO: (Name and Address of Defendant (One defendant per summons))

Sentinel Real Estate Corporation
 c/o Corporation Service Company
 2908 Poston Avenue
 Nashville, TN 37203

Method of Service:

- ☒ Certified Mail
☐ Shelby County Sheriff
☐ Commissioner of Insurance (\$)
☐ Secretary of State (\$)
☐ Other TN County Sheriff (\$)
☐ Private Process Server
☐ Other

(\$ Attach Required Fees)

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and

serving a copy of your answer to the Complaint on

Plaintiff's

attorney, whose address is

telephone _____ within THIRTY (30) DAYS after this summons has been served upon you, not including the day
 of service. If you fail to do so, a judgment by default may be taken against you for the relief demanded in the Complaint.

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master

TESTED AND ISSUED _____ By _____, D.C.

TO THE DEFENDANT:

NOTICE; Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice:

Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

FOR AMERICANS WITH DISABILITIES ACT (ADA) ASSISTANCE ONLY, CALL (901) 222-2341

I, TEMIKA D. GIPSON / W. AARON HALL, Clerk of the Court, Shelby County, Tennessee, certify this to be a true and accurate copy as filed this

20__

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master By: _____, D.C.

RETURN OF SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I HAVE SERVED THE WITHIN SUMMONS:

By delivering on the _____ day of _____, 20____ at _____ M. a copy of the summons

and a copy of the Complaint to the following Defendant: _____

at _____

Signature of person accepting service

By: _____
Sheriff or other authorized person to serve process

RETURN OF NON-SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I HAVE NOT SERVED THE WITHIN SUMMONS:

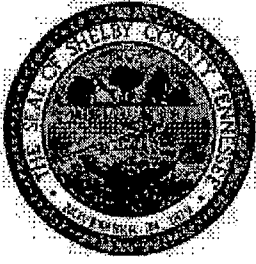
To the named Defendant _____

because _____ is (are) not to be found in this County after diligent search and inquiry for the following

reason(s): _____

This _____ day of _____, 20_____.

By: _____
Sheriff or other authorized person to serve process



The Shelby County, Tennessee Circuit Court

Case Style: ANGELA GONYON VS VINYARD RESIDENTIAL LLC

Case Number: CT-2700-22

Type: SUMMONS ISSD TO MISC

A handwritten signature in black ink, appearing to be 'DS', is written over a light gray, textured background.

David Smith, DC

Electronically signed on 07/05/2022 03:30:54 PM

**IN THE CIRCUIT COURT OF TENNESSEE FOR THE
THIRTIETH JUDICIAL DISTRICT AT MEMPHIS, SHELBY COUNTY**

ANGELA GONYON,

Plaintiff,

vs.

No. _____

Division _____

JURY TRIAL DEMANDED

**VINYARD RESIDENTIAL LLC, f/k/a
VINEYARDS APARTMENTS, INC., and
SENTINEL REAL ESTATE CORPORATION,
d/b/a THE VINEYARDS**

Defendants.

COMPLAINT

Comes now the Plaintiff, Angela Gonyon, by and through her attorney, for damages, actual and compensatory, and for cause of action against the Defendants, Vineyard Residential LLC f/k/a Vineyards Apartments, Inc. and Sentinel Real Estate Corporation, d/b/a The Vineyards, would respectfully state as follows:

PARTIES

1. Plaintiff Angela Gonyon, is an adult resident citizen of Henry County, Georgia, currently residing at 683 Hennepin Terrace, McDonough, Georgia 30253.
2. Defendant, Vineyard Residential LLC, f/k/a Vineyard Apartments, Inc., is a Delaware limited liability company with a principal office at 1251 Avenue of the Americas, Floor 35, New York NY 10020-1104. Defendant is licensed and registered to do business in Tennessee and is subject to service of process through its registered agent Corporation Service Company, 2908 Poston Avenue, Nashville, Tennessee 37203

3. Defendant, Sentinel Real Estate Corporation, is a New York corporation with its principal place of business located at 1251 Avenue of the Americas, Floor 35, New York, NY 10020-1104. Defendant is licensed and registered to do business in Tennessee and is subject to service of process through its registered agent Corporation Service Company, 2908 Poston Avenue, Nashville, Tennessee 37203.

JURISDICTION AND VENUE

4. This Complaint alleges personal injuries and damages suffered by Plaintiff, all of which occurred in Shelby County, Tennessee. Defendants are authorized to conduct business and perform services, and do in fact conduct business and perform services, in Shelby County, Tennessee.

5. The acts and omissions giving rise to this lawsuit all occurred in Shelby County, Tennessee. This Court has proper jurisdiction over this action and the parties hereto, and venue is appropriate in this Court. This lawsuit is timely filed pursuant to applicable Tennessee law.

FACTS

6. On July 7, 2021, Mrs. Angela Gonyon went to The Vineyards apartments located at 7109 Vineyard Way, Germantown, TN 38138 ("The Vineyards"), to visit a resident of The Vineyards apartments.

7. At all relevant times to this cause of action, Defendants Vineyard Residential LLC f/k/a Vineyards Apartments, Inc. and/or Sentinel Real Estate Corporation, d/b/a The Vineyards (hereinafter collectively referred to as "Defendants") owned, operated, maintained and controlled the premises of The Vineyards apartment complex and property located at 7109 Vineyard Way, Germantown, TN 38138.

8. After parking and exiting her vehicle in the parking lot of The Vineyards, Ms. Gonyon began to walk towards the apartment building. While walking in the parking lot, Ms. Gonyon tripped and fell on a raised portion(s) of pavement where the growth of tree roots had caused cracks, ridges, and uneven surfaces.

9. The growth of tree roots and the resulting raised and damaged area of pavement in the parking lot created a dangerous condition.

10. As a result of her fall, Ms. Gonyon suffered significant and permanent injuries.

11. As a result of her fall, Ms. Gonyon has incurred substantial medical bills and endured a great deal of pain and suffering.

12. All of Plaintiff's injuries and damages were actually and proximately caused by the negligence of Defendants or Defendants' employees, servants, and/or agents.

13. Defendants or Defendants' employees, servants, and/or agents knew or should have known of the dangerous condition in the parking lot at The Vineyards on the day that Ms. Gonyon was injured.

NEGLIGENCE

14. Plaintiff alleges that the Defendants, individually and/or by and through their agents, servants, and/or employees, had a duty to maintain in a safe condition the aforementioned premises, and Defendants were careless, negligent, and reckless in the following respects:

- (a) in improperly operating, managing, maintaining, and controlling their premises;

- (b) in failing to provide a reasonably safe condition for persons lawfully on said premises, including Ms. Gonyon;
- (c) in failing to properly maintain, remove, and clear the aforementioned premises to prevent the existence of the dangerous condition;
- (d) in creating the dangerous condition;
- (e) in failing to warn Plaintiff and other persons lawfully on said premises of the dangerous condition when Defendants knew or should have known in the exercise of ordinary care that said warning was necessary to prevent injury to its guests;
- (f) in failing to make a reasonable inspection of and properly supervise its premises when they knew or in the exercise of ordinary care should have known that said inspection was necessary to prevent injury to its guests and others lawfully on the premises;
- (g) in failing to properly train, monitor, and/or supervise Defendants' employees, staff, and/or agents to ensure that conditions such as the one involved in this incident did not exist on the premises and to remove such conditions if one existed;
- (h) in failing to timely repair the parking lot damage that caused Ms. Gonyon's fall;
- (i) in otherwise failing to exercise the degree of care required under the circumstances; and,
- (j) in such other negligent acts and omissions as may be discovered or proven at trial.

15. Plaintiff alleges that each of the aforesaid acts of negligence was the proximate cause and cause in fact of Plaintiff's injuries.

16. Plaintiff's injuries were reasonably foreseeable.

17. Defendants' failure to put in place policies and procedures to prevent situations from occurring such as the one that led to Ms. Gonyon's injury constitutes a breach of duty owed by Defendants to individuals, such as Ms. Gonyon.

18. All of these actions/omissions were committed by Defendants' employees and or/agents within the scope of their employment. All are attributed to Defendants based on the doctrines of *respondeat superior* and/or agency.

DAMAGES

19. As a direct and proximate result of the heretofore-described negligent acts and omissions of the Defendants, Plaintiff Angela Gonyon suffered serious injuries. The injuries and damages for which Ms. Gonyon seeks compensation from Defendants include, but are not limited to, the following:

- (a) past, present, and future physical pain and suffering;
- (b) past, present, and future emotional pain and suffering;
- (c) medical bills and expenses;
- (d) past, present, and future loss of enjoyment of life;
- (e) permanent injury and disfigurement;
- (f) lost wages and loss of earning capacity; and,
- (g) all such further relief, both general and specific, to which Plaintiff may be entitled under Tennessee law.

20. All of the above damages were directly and proximately caused by the negligence of Defendants.

21. Plaintiff specifically reserves the right to plead further in this cause as additional facts and circumstances may warrant.

PRAYERS FOR RELIEF

WHEREFORE, Plaintiff prays:

1. That Defendants be served with a copy of the Complaint for Personal Injuries in this matter;
2. That summons issue causing Defendants to answer, within thirty days;
3. For a jury to be empaneled to try the disputed issues;
4. That Plaintiff be awarded compensatory damages in an amount not to exceed five hundred thousand dollars (\$500,000.00);
5. That Plaintiff be awarded all economic expenses allowable under Tennessee law, including, but not limited to, medical expenses in an amount to be determined at trial;
6. That the Plaintiff be awarded post-judgment interest as well as all discretionary costs and other relief to which she may be entitled; and,
7. That the Plaintiff be awarded such other relief, both general and special, to which she may be entitled.

PLAINTIFFS RESPECTFULLY DEMANDS A TRIAL BY JURY.

RESPECTFULLY SUBMITTED,

Gentry Arnold, PLLC



David N. Arnold. BPR# 024294

Attorney for Plaintiff

5100 Poplar Avenue, Suite 2008

Memphis, TN 38137

Phone: (901) 591-8800

Fax: (888) 492-4905

darnold@gentryarnold.com

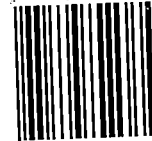
GENTRY ARNOLD PLLC

5100 Poplar Ave., Suite 2008
Memphis, TN 38137

7018 3090 0001 8392 0340



1000



37203

U.S. POSTAGE PAID
FCM LETTER
MEMPHIS, TN
38117
SEP 15, 22
AMOUNT

\$8.09

R2304P118821

-95

**Sentinel Real Estate Corporation
c/o Corporation Service Company
2908 Poston Avenue
Nashville, TN 37203**



Notice of Service of Process

null / ALL
Transmittal Number: 25620683
Date Processed: 09/26/2022

Primary Contact: Connell Watters
Sentinel Real Estate Corporation
1251 Avenue Of The Americas
36th Floor
New York, NY 10020-1104

Electronic copy provided to: Noah Gold
Andrea Klein

Entity: Vineyard Residential LLC
Entity ID Number 4194555

Entity Served: Vineyard Residential LLC (f/k/a Vineyard Apartments, Inc.)

Title of Action: Angela Gonyon vs. Vinyard Residential LLC, f/k/a Vineyards Apartivients, Inc.

Matter Name/ID: Angela Gonyon vs. Vinyard Residential LLC, f/k/a Vineyards Apartivients, Inc. (12992955)

Document(s) Type: Summons/Complaint

Nature of Action: Personal Injury

Court/Agency: Shelby County Circuit Court, TN

Case/Reference No: CT-2700-22

Jurisdiction Served: Tennessee

Date Served on CSC: 09/23/2022

Answer or Appearance Due: 30 Days

Originally Served On: CSC

How Served: Certified Mail

Sender Information: Gentry Arnold, PLLC
901-591-8800

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC

251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | sop@cscglobal.com

(CIRCUIT/CHANCERY) COURT OF TENNESSEE
 140 ADAMS AVENUE, MEMPHIS, TENNESSEE 38103
 FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS

ELECTRONICALLY FILED
 2022 Jul 05 3:29 PM
 CLERK OF COURT - CIRCUIT

SUMMONS IN CIVIL ACTION

Docket No. CT-2700-22

☒ Lawsuit
☐ Divorce

Ad Damnum \$ 500,000

Angela Gonyon

Vineyard Residential LLC, f/k/a Vineyard
 Apartments, Inc., and
 Sentinel Real Estate Corporation

VS

Plaintiff(s)

Defendant(s)

TO: (Name and Address of Defendant (One defendant per summons))

Method of Service:

Vineyard Residential LLC (f/k/a Vineyard Apartments, Inc.)
 c/o Corporation Service Company
 2908 Poston Avenue
 Nashville, TN 37203

- ☒ Certified Mail
☐ Shelby County Sheriff
☐ Commissioner of Insurance (\$)
☐ Secretary of State (\$)
☐ Other TN County Sheriff (\$)
☐ Private Process Server
☐ Other

(\$ Attach Required Fees)

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and

serving a copy of your answer to the Complaint on

Plaintiff's

attorney, whose address is

telephone _____ within THIRTY (30) DAYS after this summons has been served upon you, not including the day
 of service. If you fail to do so, a judgment by default may be taken against you for the relief demanded in the Complaint.

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master

TESTED AND ISSUED _____ By _____, D.C.

TO THE DEFENDANT:

NOTICE; Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice:

Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

FOR AMERICANS WITH DISABILITIES ACT (ADA) ASSISTANCE ONLY, CALL (901) 222-2341

I, TEMIKA D. GIPSON / W. AARON HALL, Clerk of the Court, Shelby County, Tennessee, certify this to be a true and accurate copy as filed this

_____, 20____

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master By: _____, D.C.

RETURN OF SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I HAVE SERVED THE WITHIN SUMMONS:

By delivering on the _____ day of _____, 20____ at _____ M. a copy of the summons

and a copy of the Complaint to the following Defendant _____

at _____

Signature of person accepting service

By: _____
Sheriff or other authorized person to serve process

RETURN OF NON-SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I HAVE NOT SERVED THE WITHIN SUMMONS:

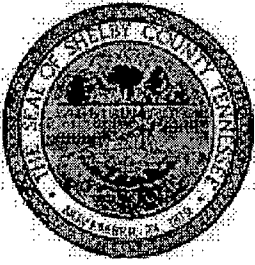
To the named Defendant _____

because _____ is (are) not to be found in this County after diligent search and inquiry for the following

reason(s): _____

This _____ day of _____, 20_____.

By: _____
Sheriff or other authorized person to serve process



The Shelby County, Tennessee Circuit Court

Case Style: ANGELA GONYON VS VINYARD RESIDENTIAL LLC

Case Number: CT-2700-22

Type: SUMMONS ISSD TO MISC

A handwritten signature in black ink, appearing to be "DS", is written over a light gray, textured background.

David Smith, DC

Electronically signed on 07/05/2022 03:30:54 PM

**IN THE CIRCUIT COURT OF TENNESSEE FOR THE
THIRTIETH JUDICIAL DISTRICT AT MEMPHIS, SHELBY COUNTY**

ANGELA GONYON,

Plaintiff,

vs.

No. _____

Division _____

JURY TRIAL DEMANDED

**VINYARD RESIDENTIAL LLC, f/k/a
VINEYARDS APARTMENTS, INC., and
SENTINEL REAL ESTATE CORPORATION,
d/b/a THE VINEYARDS**

Defendants.

COMPLAINT

Comes now the Plaintiff, Angela Gonyon, by and through her attorney, for damages, actual and compensatory, and for cause of action against the Defendants, Vineyard Residential LLC f/k/a Vineyards Apartments, Inc. and Sentinel Real Estate Corporation, d/b/a The Vineyards, would respectfully state as follows:

PARTIES

1. Plaintiff Angela Gonyon, is an adult resident citizen of Henry County, Georgia, currently residing at 683 Hennepin Terrace, McDonough, Georgia 30253.
2. Defendant, Vineyard Residential LLC, f/k/a Vineyard Apartments, Inc., is a Delaware limited liability company with a principal office at 1251 Avenue of the Americas, Floor 35, New York NY 10020-1104. Defendant is licensed and registered to do business in Tennessee and is subject to service of process through its registered agent Corporation Service Company, 2908 Poston Avenue, Nashville, Tennessee 37203

3. Defendant, Sentinel Real Estate Corporation, is a New York corporation with its principal place of business located at 1251 Avenue of the Americas, Floor 35, New York, NY 10020-1104. Defendant is licensed and registered to do business in Tennessee and is subject to service of process through its registered agent Corporation Service Company, 2908 Poston Avenue, Nashville, Tennessee 37203.

JURISDICTION AND VENUE

4. This Complaint alleges personal injuries and damages suffered by Plaintiff, all of which occurred in Shelby County, Tennessee. Defendants are authorized to conduct business and perform services, and do in fact conduct business and perform services, in Shelby County, Tennessee.

5. The acts and omissions giving rise to this lawsuit all occurred in Shelby County, Tennessee. This Court has proper jurisdiction over this action and the parties hereto, and venue is appropriate in this Court. This lawsuit is timely filed pursuant to applicable Tennessee law.

FACTS

6. On July 7, 2021, Mrs. Angela Gonyon went to The Vineyards apartments located at 7109 Vineyard Way, Germantown, TN 38138 ("The Vineyards"), to visit a resident of The Vineyards apartments.

7. At all relevant times to this cause of action, Defendants Vineyard Residential LLC f/k/a Vineyards Apartments, Inc. and/or Sentinel Real Estate Corporation, d/b/a The Vineyards (hereinafter collectively referred to as "Defendants") owned, operated, maintained and controlled the premises of The Vineyards apartment complex and property located at 7109 Vineyard Way, Germantown, TN 38138.

8. After parking and exiting her vehicle in the parking lot of The Vineyards, Ms. Gonyon began to walk towards the apartment building. While walking in the parking lot, Ms. Gonyon tripped and fell on a raised portion(s) of pavement where the growth of tree roots had caused cracks, ridges, and uneven surfaces.

9. The growth of tree roots and the resulting raised and damaged area of pavement in the parking lot created a dangerous condition.

10. As a result of her fall, Ms. Gonyon suffered significant and permanent injuries.

11. As a result of her fall, Ms. Gonyon has incurred substantial medical bills and endured a great deal of pain and suffering.

12. All of Plaintiff's injuries and damages were actually and proximately caused by the negligence of Defendants or Defendants' employees, servants, and/or agents.

13. Defendants or Defendants' employees, servants, and/or agents knew or should have known of the dangerous condition in the parking lot at The Vineyards on the day that Ms. Gonyon was injured.

NEGLIGENCE

14. Plaintiff alleges that the Defendants, individually and/or by and through their agents, servants, and/or employees, had a duty to maintain in a safe condition the aforementioned premises, and Defendants were careless, negligent, and reckless in the following respects:

- (a) in improperly operating, managing, maintaining, and controlling their premises;

- (b) in failing to provide a reasonably safe condition for persons lawfully on said premises, including Ms. Gonyon;
- (c) in failing to properly maintain, remove, and clear the aforementioned premises to prevent the existence of the dangerous condition;
- (d) in creating the dangerous condition;
- (e) in failing to warn Plaintiff and other persons lawfully on said premises of the dangerous condition when Defendants knew or should have known in the exercise of ordinary care that said warning was necessary to prevent injury to its guests;
- (f) in failing to make a reasonable inspection of and properly supervise its premises when they knew or in the exercise of ordinary care should have known that said inspection was necessary to prevent injury to its guests and others lawfully on the premises;
- (g) in failing to properly train, monitor, and/or supervise Defendants' employees, staff, and/or agents to ensure that conditions such as the one involved in this incident did not exist on the premises and to remove such conditions if one existed;
- (h) in failing to timely repair the parking lot damage that caused Ms. Gonyon's fall;
- (i) in otherwise failing to exercise the degree of care required under the circumstances; and,
- (j) in such other negligent acts and omissions as may be discovered or proven at trial.

15. Plaintiff alleges that each of the aforesaid acts of negligence was the proximate cause and cause in fact of Plaintiff's injuries.

16. Plaintiff's injuries were reasonably foreseeable.

17. Defendants' failure to put in place policies and procedures to prevent situations from occurring such as the one that led to Ms. Gonyon's injury constitutes a breach of duty owed by Defendants to individuals, such as Ms. Gonyon.

18. All of these actions/omissions were committed by Defendants' employees and or/agents within the scope of their employment. All are attributed to Defendants based on the doctrines of *respondeat superior* and/or agency.

DAMAGES

19. As a direct and proximate result of the heretofore-described negligent acts and omissions of the Defendants, Plaintiff Angela Gonyon suffered serious injuries. The injuries and damages for which Ms. Gonyon seeks compensation from Defendants include, but are not limited to, the following:

- (a) past, present, and future physical pain and suffering;
- (b) past, present, and future emotional pain and suffering;
- (c) medical bills and expenses;
- (d) past, present, and future loss of enjoyment of life;
- (e) permanent injury and disfigurement;
- (f) lost wages and loss of earning capacity; and,
- (g) all such further relief, both general and specific, to which Plaintiff may be entitled under Tennessee law.

20. All of the above damages were directly and proximately caused by the negligence of Defendants.

21. Plaintiff specifically reserves the right to plead further in this cause as additional facts and circumstances may warrant.

PRAYERS FOR RELIEF

WHEREFORE, Plaintiff prays:

1. That Defendants be served with a copy of the Complaint for Personal Injuries in this matter;
2. That summons issue causing Defendants to answer, within thirty days;
3. For a jury to be empaneled to try the disputed issues;
4. That Plaintiff be awarded compensatory damages in an amount not to exceed five hundred thousand dollars (\$500,000.00);
5. That Plaintiff be awarded all economic expenses allowable under Tennessee law, including, but not limited to, medical expenses in an amount to be determined at trial;
6. That the Plaintiff be awarded post-judgment interest as well as all discretionary costs and other relief to which she may be entitled; and,
7. That the Plaintiff be awarded such other relief, both general and special, to which she may be entitled.

PLAINTIFFS RESPECTFULLY DEMANDS A TRIAL BY JURY.

RESPECTFULLY SUBMITTED,

Gentry Arnold, PLLC



David N. Arnold. BPR# 024294

Attorney for Plaintiff

5100 Poplar Avenue, Suite 2008

Memphis, TN 38137

Phone: (901) 591-8800

Fax: (888) 492-4905

darnold@gentryarnold.com

GENTRY ARNOLD_{PLLC}

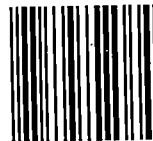
5100 Poplar Ave., Suite 2008
Memphis, TN 38137



7018 3090 0001 8392 0333



1000



37203

U.S. POSTAGE PAID
FCM LETTER
MEMPHIS, TN
38117
SEP 15, 22
AMOUNT

\$8.09

R2304P118821

-91

**Vineyard Residential LLC (f/k/a Vineyard
Apartments Inc.)
c/o Corporation Service Company
2908 Poston Avenue
Nashville, TN 37203**